

MAR - 3 2021

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
SUPERSEDED

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

TISHONDA TURNER, and  
FREDDIE TILMON

Defendants.

No. S1-4:21-CR-00131 RWS:DDN

**SUPERSEDING INDICTMENT**

**COUNT ONE**

The Grand Jury charges that:

On or about July 16, 2020, in St. Louis County, within the Eastern District of Missouri,

**TISHONDA TURNER,**

the defendant herein, in connection with the acquisition of one or more firearms from The Range STL West, a licensed dealer, did knowingly make a false and fictitious written statement to said dealer, which statement was intended and likely to deceive said licensed dealer with respect to a fact material to the lawfulness of the sale of said firearms under Chapter 44 of Title 18 of the United States Code, in that **TISHONDA TURNER**, represented that she was the actual buyer of one or more firearms, when, in fact, said defendant was acquiring one or more firearms on behalf of another, to wit: **FREDDIE TILMON**.

In violation of Title 18, United States Code, 922(a)(6), and 924(a)(2).

**COUNT TWO**

The Grand Jury charges that:

On or about August 08, 2020, in St. Louis County, within the Eastern District of Missouri,

**TISHONDA TURNER,**

the defendant herein, in connection with the acquisition of one or more firearms from The Range STL West, a licensed dealer, did knowingly make a false and fictitious written statement to said dealer, which statement was intended and likely to deceive said licensed dealer with respect to a fact material to the lawfulness of the sale of said firearms under Chapter 44 of Title 18 of the United States Code, in that **TISHONDA TURNER**, represented that she was the actual buyer of one or more firearms, when, in fact, said defendant was acquiring one or more firearms on behalf of another, to wit: **FREDDIE TILMON**.

In violation of Title 18, United States Code, 922(a)(6), and 924(a)(2).

**COUNT THREE**

The Grand Jury charges that:

On or about August 08, 2020, in St. Louis County, within the Eastern District of Missouri,

**FREDDIE TILMON,**

the Defendant herein, knowingly possessed one or more firearms, knowing he had previously been convicted in a court of law of one or more crimes punishable by a term of imprisonment exceeding one year, and the firearms previously traveled in interstate or foreign commerce during or prior to being in Defendant's possession.

In violation of Title 18, United States Code, Section 922(g)(1).

A TRUE BILL

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FOREPERSON

SAYLER A. FLEMING  
United States Attorney

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KOURTNEY M. BELL, #300171 (CA)  
Assistant United States Attorney